

THE ANIMAL COUNCIL

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April 17, 2012

Via Facsimile 916-324-0917

The Honorable Curran Price, Chair
The Honorable Bill Emmerson, Vice-Chair
Senate Committee on Business, Professions & Economic Development
State Capitol, Room 2053
Sacramento CA 95814

Attention: Bill Consultant

Re: SB 969, Pet Groomers, as amended April 9, 2012, OPPOSE

Dear Chairman Price and Members:

Please register our opposition to the above-captioned bill and include our organization on your Committee's Bill Analysis opposition list.

Pet grooming traditionally is a "pink collar" profession conducted primarily by women as sole proprietors or in small business settings. Pet grooming often allows women the flexibility to work, or not work full time or for short or long periods in accordance with family needs. Women, in particular, can acquire training and experience throughout the United States and elsewhere in the world at any age and with any background as long as they have adequate manual dexterity, physical ability and desire to handle pets and deal with their owners. Additionally, some professional groomers and some individual who may not be have craftsman-like skills used for certain breeds and activities that go beyond everyday maintenance grooming for the general public.

If pet grooming were to be regulated, this should only be done under the same provisions afforded other skilled trades and professions --- namely, the regulating body is comprised mainly of individuals trained and having worked in the field along with minority public representation affording a common sense approach to balancing needs of practitioners and clients and their animals. With the numerous constraints on California's existing regulatory agencies, this does not seem feasible, nor has it ever.

The governing council proposed by this bill is so expansive in its possible membership and so uncertain as to any specific representation as to defy that basic premise that regulating a given field must be done largely by practitioners. In fact, this bill does not appear to mandate any representation by anyone trained or skilled in grooming and allots only one position among many for any person knowledgeable about grooming. There is no specific position for the hundreds of skilled, experienced small business operators, particularly women, who are the backbone of the field.

On their behalf, we might speculate that the composition of the council is intended to personally intimidate and marginalize them and ignore their collective practical skill and wisdom in grooming pets, their own and those of their trusted and trusting clients.

The designated positions, all optional if not filled, include nothing for the interested public directly. Others have an interest in law enforcement of laws related to animals, but these entities have no involvement with the practice of grooming. The "SPCA" is not designated properly as to what entity is intended. The State Bar of California has no involvement in the so-called field of "animal law" as there is not and never has been any designated Section of the State Bar, a specialty practice area or any California statewide group of attorneys holding themselves out as such. Almost all attorneys who hold themselves out as practicing "animal law" begin not from a personal knowledge of and experience with animals but in pursuing some personal ideal of the role of animals in society or the world. Those who eventually do represent clients in actual cases quickly learn practical and sometimes hard lessons. Some expect to carve out areas of law expressing their perceived interests while relegating everyone else to second-class or worse legal status. Certainly skilled legal counsel would be required to conduct the proposed council, but "animal lawyers" may have few or none of the requisite skills .

There are positions for each high grossing entity providing grooming services, yet none for small operators. High grossing retailers, presumably operating as business corporations in the retail field only provide grooming services, incidental to their core operations and as a way to attract customers much as a department store might have a hair salon. Yet, would it be good public policy for large department stores, perhaps with some law enforcement agencies, to control the cosmetology field to the exclusion of independent salons?

We believe that the best interests of protecting the public access to skilled pet groomers best able to properly care for pets is to protect the vast majority of groomers who work directly with the public independently in small business settings. If this cannot be done in a fair, equitable way comparable to regulation of similar public service providers, then the public interests weigh against badly-conceived legislative alternatives as set forth in SB 969.

Accordingly, we must oppose this bill and respectfully as that you not support it.

THE ANIMAL COUNCIL (TAC) is a California nonprofit, public benefit corporation founded in 1991 to seek positive, humane solutions to the challenges of detrimental animal public policies, legislation and regulation through study, analysis and application of animal husbandry, statistics and law, and at the same time preserve human benefit from all species, breeds and registries.

Very truly yours,



SHARON A. COLEMAN
President, The Animal Council

Cc: Author
Committee Members